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March 21, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

**Re: Western Wireless Corporation Petition for Designation as An Eligible
Telecommunications Carrier on the Crow Reservation, CC Docket 96-45, DA 99-
1847 and Deployment in Unserved and Underserved Areas, Including Tribal and
Insular Areas, FCC 99-204**

Ex Parte Presentation

Dear Ms. Salas:

On March 21, 2000 Michael Strand and David Cosson, representing Project Telephone Company met with Irene Flannery, Lisa Boehley, Mark Nadel, Richard Smith and Gene Fullano to discuss the above referenced Petition and Rulemaking.

In order to respond precisely to issues regarding the number of served and unserved households and the local service rates on the Crow Reservation, the attached summary of available data was provided. This data shows that of 1,713 residences in Project Telephone Company's service area, between 1,214 and 1,241 subscribe to telephone service, depending on the time and method of counting. The subscribership ratio for Project's exchanges on the Reservation is therefore at least in excess of 70%. It is therefore not correct, as reported in Western Wireless' *ex parte* of March 8, 2000 that 65% of the population is without telephone service.

In regard to the local rates, Project's residential local rate on the Reservation, per its tariff filed with the Montana Public Service Commission, is \$13.00 per month. Adding the subscriber line charge, 911 charge, Montana telephone access charge and taxes brings the monthly total to \$18.09 before long distance charges. Range Telephone Cooperative's local rate is \$10.65 plus a similar level of additions.

The representatives of Project Telephone Company reiterated its commitment to obtaining EAS authority in order to provide toll free calling into the Billings area. The incremental charge to consumers will vary depending on the methodology chosen by the state commission.

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The Project representatives also responded to a question regarding division of its study area with the comment that there would be an increase in administrative cost, but little or no change in support amounts. In any event, Project's facilities provide access for virtually the entire Reservation. For the U S West portion of the Reservation, the result would be to create a high cost study area, but under the current rules for non-rural companies, there would still be no support available because the state as a whole would remain below the benchmark.

Please contact me if there are any questions regarding this matter.

Sincerely



David Cosson

Counsel for Project Telephone Company

Attachment

cc: Chairman Kennard
Commissioner Ness
Commissioner Tristani
Commissioner Powell
Commissioner Furtchtgott-Roth
Irene Flannery
Lisa Boehley
Mark Nadel
Richard Smith
Gene Fullano

PROJECT TELEPHONE COMPANY

ACCESS LINES AND RATES ON CROW RESERVATION

ACCESS LINES

1. Access Line Data Report to Rural Utilities Service for Crow Agency, Fort Smith, Lodge Grass and Wyola exchanges of Project Telephone Company, period ending February 20, 2000:

Residence Subscribers:	1241 ¹
Business Subscribers:	525
Total	1746

2. Project Telephone Company residential directory listings as of March 16, 2000:²

Published	861
Non-published	353
Total	1214

RESIDENCES IN PROJECT TELEPHONE COMPANY SERVICE AREA

1. With two exceptions³, all occupied dwellings on the Reservation are known to have electric service. An examination was made of the records of the Big Horn County Rural Electric Cooperative to determine the number of residences in the Project Telephone Company service area. The examination was conducted by Project's Plant Superintendent with the assistance of two technicians, both of whom work and reside on the Reservation and are members of the Crow Tribe. The count excluded multiple meters at a house, seasonal and commercial customers. The study identified 1713 residential electric meters.⁴

¹ Includes 45 Lifeline subscribers.

² Excludes multiple listings at a residence.

³ Both of these residences have telephone service.

⁴ Western Wireless' claim (Comments in CC Docket 96-45, Dec. 17, 1999, Attachment) that there are 1700 homes on the Reservation would include the U S West and Range Cooperative service areas. Three residences were identified as being beyond the one mile distance from Project facilities for which an aid to construction charge would be required.

2. Using the lower subscriber count of 1214 yields a subscribership ratio of 70.87%.or 499 homes (29.13%) without service.⁵ Using 1241 subscribers the ratio is 72.45%. The minor variation in subscriber counts is attributable to normal fluctuations over time, and the differences between computing methods..

RESIDENTIAL RATES ON CROW RESERVATION (Per attached tariff sheets)

1. **Basic R1 Rates**

Project:	\$13.00
Range:	10.65
U S West	24.92 ⁶

2. **Additional Charges (Project)**

SLC	\$3.50
911	.50
MT Tel Acc.	.10
Taxes	.99

3. **Total Project Charges:** **\$18.09**

⁵ Using Western Wireless' count of 1700 homes on the Reservation, and adding 381 US West lines (from FCC Hold Harmless Report) and 37 Range Cooperative subscribers to Project's 1214 subscribers would yield a subscribership ratio of 96%, which is known to be incorrect..

⁶ Composed of base rate of \$16.73, plus zone increment of \$5.75 and EAS additive of \$2.44. Adding the additional \$5.09 in miscellaneous charges and taxes, would bring the U S West charge to \$30.01 and the Range charge to \$15.74.